



August 12, 2011

Mark Sylvia  
Commissioner  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Mr. Sylvia,

CE2 Carbon Capital LLC appreciates the opportunity to submit comments regarding the Department of Energy Resources' ("DOER") proposed Forward Schedule of the Alternative Compliance Payment ("ACP"). We commend the DOER on its recent ACP proposal and express our support. Below are our comments on the proposed schedule.

1. The DOER's proposed action to establish long-term certainty with respect to the SACP schedule as contemplated in the Solar RPS Carve-Out proposal helps to meet several objectives including providing much needed clarity to developers for project planning purposes and transparent prices for investors, lenders, compliance entities and other market participants.
2. The proposed SACP schedule should help to encourage the development of long-term SREC off-take contracts which underpin project development and project finance. A more rapidly declining SACP schedule could lead to less project development, less project finance, and lower the appetite for long-term SREC financing. It is our belief that when looking at other markets including New Jersey, delays in establishing long-term and transparent SACP schedules have been in part responsible for the uncertainty in developing and financing projects in that market.

Please let us know if we can answer any questions or clarify our comments. We look forward to working with the DOER in the future to ensure the sustainability and success of the SREC program.

Sincerely,



Harold Buchanan  
CEO